

1 WILLIAM H. BROWN, ESQ. (7623)
2 BROWN MISHLER, PLLC
3 911 N. Buffalo Dr., Ste. 202
4 Las Vegas, Nevada 89128
5 Tel: (702) 816-2200
6 Fax: (702) 816-2300
7 Email: WBrown@BrownMishler.com
8 *Attorney for Defendant*
9 *Pedro Montalvo*

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA,

2:20-cr-00156-RFB-DJA

13 Plaintiff,

**Stipulation to Continue
Sentencing and
PSR-Objection Deadline
(Second Request)**

14 vs.

15 ADALI ARNULFO ESCALANTE-
16 TRUJILLO, et al.,

17 Defendants.

18 It is hereby stipulated and agreed, by and between JASON M.
19 FRIERSON, United States Attorney, through JACOB H. OPERSKALSKI,
20 Assistant United States Attorney, and WILLIAM BROWN, counsel for
21 defendant Pedro Montalvo, that:

- 22
- 23 (1) Pedro Montalvo's sentencing date in the above-captioned matter,
24 currently scheduled for August 21, 2023, at 2:45 p.m., be vacated
25 and continued at least forty-five days (45) days, to October 5, 2023,
or to a time convenient to the Court; and
- 26 (2) the LCR 32-1(b) deadline to submit informal objections to the
27 presentence investigation report (PSR), which is currently August
28 14, 2023, shall be continued at least 14 (14) days, up to and
including August 28, 2023.

1
2 This Stipulation is entered into for the following reasons:

3
4 1. This is the second requested continuance for sentencing.

5 2. The defense requires further time to thoroughly review the PSR,
6 confer with Mr. Montalvo and, where appropriate, set forth appropriate
7 objections, and also to investigate and potentially resolve an outstanding
8 matter currently pending in California state court (the defense having
9 resolved a separate similar matter since receiving the PSR).
10

11
12 3. Additionally, the defense requires more time complete its
13 sentencing investigation and research and prepare a meaningful sentencing
14 memorandum.
15

16 4. The government does not object to the requested continuance of
17 the sentencing date or the informal PSR-objection deadline.
18

19 5. The defendant is out of custody and does not object to the
20 requested continuance of the sentencing date or the PSR-objection deadline.
21

22 Date: August 3, 2023

23 Counsel for PEDRO MONTALVO

JASON M. FRIERSON
United States Attorney

24
25 /s/ William Brown
26 WILLIAM H. BROWN
27 BROWN MISHLER, PLLC
28

/s/ Jacob Operskalski
JACOB H. OPERSKALSKI
Assistant United States Attorney

1 WILLIAM H. BROWN, ESQ. (7623)
2 BROWN MISHLER, PLLC
3 911 N. Buffalo Dr., Ste. 202
4 Las Vegas, Nevada 89128
5 Tel: (702) 816-2200
6 Fax: (702) 816-2300
7 Email: WBrown@BrownMishler.com
8 *Attorney for Defendant*
9 *Pedro Montalvo*

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA,

2:20-cr-00156-RFB-DJA

13 Plaintiff,

**Order Continuing
Sentencing Hearing and
PSR-Objection Deadline**

14 vs.

15 ADALI ARNULFO ESCALANTE-
16 TRUJILLO, et al.,

17 Defendants.

18 Based on the pending stipulation of counsel, and good cause appearing
19 therefore, the Court hereby: (1) vacates the current sentencing date of August
20 21, 2023, at 2:45 p.m., and continues it to October 16, 2023 at 9:30 a.m.; and (2)
21 extends the LCR 32-1(b) deadline to submit informal objections to the
22 presentence investigation report (PSR), to August 28, 2023.
23

24 DATED this 4th day of August, 2023.

25 

26 UNITED STATES DISTRICT JUDGE
27
28